

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
DECEMBER 19, 2023 THROUGH JANUARY 31, 2024

Debtor: LTL Management LLC Applicant: Brown Rudnick LLP
Case No.: 23-12585 (MBK) Client: Official Comm of Talc Claimants
Chapter: 11 Case Filed: April 4, 2023

SECTION 1
FEE SUMMARY

Post-Dissolution Monthly Fee Statement No. 2 or Final Fee Application

Summary of Amounts Requested for the Period from December 19, 2023¹ through January 31, 2024
(the “Second Post-Dissolution Statement”)

| | |
|---|---------------------------|
| Total Fees: | \$306,949.00 ² |
| Total Disbursements: | \$2,071.53 |
| Minus 20% holdback of Fees (\$126,244.40): | \$61,389.80 |
| Total Amount Sought To Be Paid at this Time: | \$247,630.73 |

| NAME OF PROFESSIONAL & TITLE | YEAR ADMITTED (Or Years of Professional Service) | HOURS | RATE | Fee |
|------------------------------|--|-------|---------|--------------|
| David J. Molton | Partner 1983 | 6.8 | \$1,950 | \$13,260.00 |
| David J. Molton | Partner 1983 | 29.4 | \$2,250 | \$66,150.00 |
| Jeffrey L. Jonas | Partner 1988 | 1.4 | \$2,250 | \$3,150.00 |
| Michael S. Winograd | Partner 2001 | 14.8 | \$1,280 | \$18,944.00 |
| Michael S. Winograd | Partner 2001 | 86.9 | \$1,800 | \$156,420.00 |
| Sunni P. Beville | Partner 2002 | 3.8 | \$1,390 | \$5,282.00 |
| Sunni P. Beville | Partner 2002 | 7.1 | \$1,800 | \$12,780.00 |

¹ Brown Rudnick’s First Post-Dissolution Statement was filed for the period through December 20, 2023. There are some time entries from the period December 19 through December 20 which were not previously included in the First Post-Dissolution Statement and are included here.

² Brown Rudnick excluded fees in the amount of \$18,486.50 in respect of transient timekeepers and other voluntary reductions.

| NAME OF PROFESSIONAL & TITLE | YEAR ADMITTED (Or Years of Professional Service) | HOURS | RATE | FEE |
|------------------------------|--|--------------|---------|---------------------|
| Susan Sieger-Grimm | Counsel 1994 | 2.1 | \$1,055 | \$2,215.50 |
| Susan Sieger-Grimm | Counsel 1994 | 15.4 | \$1,200 | \$18,480.00 |
| Matthew A. Sawyer | Associate 2019 | 4.3 | \$950 | \$4,085.00 |
| Isabelle R. Jacobs | Associate 2018 | 2.1 | \$890 | \$1,869.00 |
| David Weinstein | Associate 2020 | 2.5 | \$695 | \$1,737.50 |
| Harriet E. Cohen | Paralegal | 2.4 | \$490 | \$1,176.00 |
| Harriet E. Cohen | Paralegal | 2.8 | \$500 | \$1,400.00 |
| TOTALS | | 181.8 | | \$306,949.00 |

Fee Totals: \$306,949.00

Disbursements Totals: \$2,071.53

Total Fee Application \$309,020.53

SECTION II
SUMMARY OF SERVICES

| SERVICES RENDERED | HOURS | Fee |
|---|--------------|--------------|
| a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries. | 0.0 | \$0.00 |
| b) Asset Disposition Sales, leases, abandonment and related transaction work. | 0.0 | \$0.00 |
| c) Avoidance Action Litigation Preference and fraudulent transfer litigation. | 0.0 | \$0.00 |
| d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems. | 0.0 | \$0.00 |
| e) Case Administration Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries. | 0.0 | \$0.00 |
| f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims. | 0.0 | \$0.00 |
| g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan. | 0.0 | \$0.00 |
| h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures. | 16.5 | \$20,953.00 |
| i) Fee/Employment Objections Review of an objections to the employment and fee applications of others. | 0.0 | \$0.00 |
| j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis. | 0.0 | \$0.00 |
| k) Litigation General litigation and other contested matters. | 143.2 | \$254,995.50 |
| l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings. | 20.2 | \$29,140.50 |
| m) Plan and Disclosure Statement Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims. | 0.0 | \$0.00 |

| SERVICES RENDERED | HOURS | Fee |
|---|--------------|------------|
| n) Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals. | 0.0 | \$0.00 |
| o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis. | 0.0 | \$0.00 |
| p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies. | 0.0 | \$0.00 |
| q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries. | 0.0 | \$0.00 |
| r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc. | 0.0 | \$0.00 |
| s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc. | 0.0 | \$0.00 |
| t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current. | 0.0 | \$0.00 |
| u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns. | 0.0 | \$0.00 |
| v) Valuation Appraise or review appraisals of assets. | 0.0 | \$0.00 |
| w) Travel Time (billed @ 50%) | 0.0 | \$0.00 |
| x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters. | 1.9 | \$1,860.00 |
| y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action. | 0.0 | \$0.00 |
| z) Hearings Preparation for and attendance at hearings. | 0.0 | \$0.00 |
| aa) Mediation Preparation for and attendance at mediation. | 0.0 | \$0.00 |
| bb) Dismissal / Trustee / Examiner Matters Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable. | 0.0 | \$0.00 |

| SERVICES RENDERED | HOURS | FEE |
|--|--------------|---------------------|
| cc) Meetings of Co-Counsel Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings. | 0.0 | \$0.00 |
| SERVICE TOTALS: | 181.8 | \$306,949.00 |

SECTION III
SUMMARY OF DISBURSEMENTS

| DISBURSEMENTS | AMOUNT |
|--|-------------------|
| a) Filing Fees Payable to Clerk of Court. | \$276.01 |
| b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost. | \$608.00 |
| c) Pacer Fees Payable to the Pacer Service Center for search and/or print. | \$11.60 |
| d) Fax Include per page fee charged. | \$0.00 |
| e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. | \$0.00 |
| f) In-house Reproduction Services Exclusive of overhead charges. | \$0.00 |
| g) Outside Reproduction Services Including scanning services. | \$0.00 |
| h) Other Research Title searches, UCC searches, Asset searches, Accurint. | \$0.00 |
| i) Court Reporting Deposition Services / Transcripts | \$0.00 |
| j) Travel Mileage, tolls, airfare, parking. | \$279.48 |
| k) Courier & Express Carriers Overnight and personal delivery. | \$105.65 |
| l) Postage | \$0.00 |
| m) Other (specify) Meals Meals. | \$121.65 |
| p) Other (specify) Expert Fees. | \$0.00 |
| q) Other (specify) Miscellaneous Expenses - postage. | \$14.32 |
| r) Other (specify) eDiscovery Hosting. | \$654.82 |
| DISBURSEMENTS TOTAL: | \$2,071.53 |

I certify under penalty of perjury that the above is true.

Date: February 23, 2024

/s/ Gerard T. Cicero

BROWN RUDNICK LLP (“Brown Rudnick”) submits this Second Post-Dismissal Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from December 19, 2023 through January 31, 2024 (“Second Post-Dismissal Monthly Fee Statement”), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”).

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the Second Post-Dismissal Monthly Fee Statement in the sum of \$245,559.20, together with expenses of \$2,071.53, for a total requested payment of \$247,630.73, in accordance with the terms of the Interim Compensation Order.

Dated: February 23, 2024

BROWN RUDNICK LLP
*Co-Counsel to the Official Committee
of Talc Claimants*

By: /s/ Gerard T. Cicero
GERARD T. CICERO